

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.,

Debtors.¹

PROMESA
Title III

No. 17 BK 03283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE EMPLOYMENT RETIREMENT
SYSTEM OF THE COMMONWEALTH OF
PUERTO RICO (“ERS”),

Debtor.

PROMESA
Title III

No. 17 BK 03566-LTS

**INFORMATIVE MOTION REGARDING ATTENDANCE AT JANUARY 19-20
OMNIBUS HEARING**

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as bankruptcy case numbers due to software limitations).

TO THE HONORABLE COURT:

Individual plaintiffs, Pedro José Nazario Serrano; Joel Rivera Morales; María de Lourdes Gómez Pérez; Héctor Cruz Villanueva; Lourdes Rodríguez y Luis M. Jordán Rivera, all of them Retirees/Beneficiaries and Plaintiffs in a claim for damages described below that is currently pending in the Commonwealth of Puerto Rico Court of First Instance, San Juan Part (the “Commonwealth Court”) without submitting to the jurisdiction of this Court, very respectfully submit this Informative Motion in Compliance with the Order Regarding Procedures for Hearing on January 19-20, and Friday 16-17, 2022 (ECF # 19720). The Individual Plaintiffs inform as follows:

1. On this same date, the Individual Retirees and Beneficiaries of the Employees Retirement System filed an *Urgent Objection to the Modified Eighth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* (ECF # 19766).

2. The Court entered a Scheduling Order, in which it ordered the Financial Oversight and Management Board of Puerto Rico to file its reply to the Individual Retirees’ Urgent Objection by January 17, 2022 at 12:00 pm. (ECF # 19776).

3. In an attempt to place form over substance, UBS Financial Services Incorporated of Puerto Rico filed a Reply to the Individual Retirees’ *Urgent Objection to the Modified Eighth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* (ECF # 19782).

4. Individual Retirees intent to file a response to the UBS Financials’ Reply.

5. Harold D. Vicente-Gonzalez will speak, if necessary, on behalf of the individual retirees at the January 19-20 Omnibus Hearing, which will be conducted by Zoom Videoconference. The required Party Appearance Sheet accompanies this Informative Motion as **Exhibit A**.

THEREFORE, the individual plaintiffs respectfully request this Honorable Court to deny the Motion of UBS for relief of the automatic stay.

Respectfully Submitted.

In San Juan, Puerto Rico, this 14 day of January 2022.

I HEREBY CERTIFY: That on this same date a true and exact copy of this motion was filed with the Clerk of Court using CM/ECF system, which will notify a copy to counsel of record. Also, copy of this document will be notified via electronic mail to all case participants.

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